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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

**SPENCER NORMAN, KIEFER NORMAN, COURTNEY NORMAN,
and HELEN S. NORMAN**

VS.

**CAMDEN COUNTY, BRIAN D. FIENE, DWIGHT D. FRANKLIN,
RICHARD B. DZIADOSZ, LARRY L. RUTHERFORD, and JAMEE L.
WATSON**

Case No. 2:12-CV-04210-NKL

DEPOSITION OF DR. CHRISTOPHER LONG

JUNE 11, 2013

Exhibit

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1 IT IS HEREBY STIPULATED AND AGREED, by
2 and between counsel for the Plaintiffs and counsel
3 for the Defendants, that the deposition of DR.
4 CHRISTOPHER LONG may be taken in shorthand by
5 Suzanne Zes, a Certified Court Reporter, and
6 afterwards transcribed into typewriting; and the
7 signature of the witness is expressly waived.

8 * * * * *

9 DR. CHRISTOPHER LONG,
10 of lawful age, produced, sworn, and examined on
11 behalf of the Defendants, deposes and says:

12 EXAMINATION

13 (Exhibits 1 through 5 were marked for
14 identification by the court reporter.)

15 QUESTIONS BY MR. HENSON:

16 Q. Sir, would you please state your full
17 name and business address for the record.

18 A. Christopher Long. 6059 North Hanley
19 Road, out here in Berkeley.

20 Q. And, Doctor -- well, is the correct
21 title for you doctor?

22 A. Yes, sir.

23 Q. My name is Keith Henson. I've
24 introduced myself to you and you understand that we
25 are here today to take your deposition in a lawsuit

1 A. Yes, routine.

2 Q. That report, who was it sent to, if
3 anyone?

4 A. It would have been sent back to
5 Dr. Adelstein's office.

6 Q. Did you have any discussions with
7 Dr. Adelstein or anyone in his office about the
8 toxicology report?

9 A. I don't believe so.

10 Q. Do you ever recall having any
11 discussions with Dr. Stacy or any other doctor at
12 the University of Missouri about the toxicology
13 report?

14 A. I don't believe so, no.

15 Q. Let me hand you what I have marked as
16 Exhibit 3. Can you identify that for us, please?

17 A. Yes, this is the toxicology report
18 showing the summation of our testing.

19 Q. And Exhibit 3 is actually entitled the
20 "St. Louis University Toxicology Laboratory Report,"
21 correct?

22 A. Yes, sir.

23 Q. And it indicates that it is a report for
24 Glenn Norman age 46 years?

25 A. Yes, sir.

1 Q. Who is white and a male; is that
2 correct?

3 A. Yes, sir.

4 Q. And the toxicology number, I assume
5 that's the number that you would have assigned it
6 here at the toxicology laboratory?

7 A. Yes, sir.

8 Q. And that toxicology number is 2011-7310;
9 is that correct?

10 A. Yes, sir.

11 Q. This report is actually a two-page
12 report; is that correct?

13 A. Yes, sir.

14 Q. And it appears that it's signed on the
15 second page. Who signed that report?

16 A. This is -- Joe Crifasi actually signed
17 the report for me.

18 Q. And this report indicates it's a report
19 from you; is that correct?

20 A. Yes, sir.

21 Q. Is Mr. Crifasi authorized to sign your
22 signature to a report?

23 A. Yes, sir.

24 Q. Does this report confirm the results of
25 the blood and urine testing for Glenn Norman?

1 A. Yes, sir.

2 Q. And what was the date of this report?

3 A. The report was issued October 26th,
4 2011, at approximately 12:38 p.m.

5 Q. Did you test the blood and urine of
6 Glenn Norman for alcohol and drugs?

7 A. We tested the blood for alcohol, that
8 was negative, so there was no reason to test the
9 urine. We screened the blood and we confirmed in
10 the blood and the urine.

11 Q. Did you find any presence of alcohol in
12 either the blood or the urine of Glenn Norman when
13 you did the testing?

14 A. There was no detection of alcohol or
15 other volatiles in the blood.

16 Q. Did the tests that you performed on the
17 blood of Glenn Norman confirm the presence of any
18 drugs in Mr. Norman's system?

19 A. Yes, sir.

20 Q. Can you tell us what drugs the blood
21 testing confirmed were present in Glenn Norman's
22 system?

23 A. It showed Cyclobenzaprine, which is
24 Flexeril, present at .1 micrograms per mil. It
25 showed Methamphetamine present in the blood at .56

1 micrograms per mil. It showed a trace of
2 Hydrocodone at less than .05 micrograms per mil in
3 the blood.

4 In the urine it showed Methamphetamine at
5 greater than 5 micrograms per mil and Amphetamine at
6 2.3 micrograms per mil. It also showed Hydrocodone
7 at greater than 4 micrograms per mil and
8 Hydromorphone at .41 micrograms per mil and
9 Dihydrocodeine at 1.4 micrograms per mil.

10 Q. Let's go through each of those drugs and
11 talk about them for a minute, Doctor.

12 The first drug that I believe you said --
13 that was indicated is Cyclobenzaprine; is that
14 correct?

15 A. Yes, sir.

16 Q. What type of drug is Cyclobenzaprine?

17 A. It's a muscle relaxant. It's used for
18 back spasms and things of that nature.

19 Q. And the level that you found of
20 Cyclobenzaprine it appears to me to be 0.10
21 micrograms per milliliter; is that correct?

22 A. Yes, sir.

23 Q. Is that level high, low, moderate? How
24 would you describe that level of Cyclobenzaprine?

25 A. That is a low level of the drug, a low

1 restores you to a pre-fatigued state. It gets your
2 heart pumping, your blood pressure up, increased
3 awareness, alertness, and that's the therapeutic
4 side.

5 Then you go to the toxic side and you get
6 hyperactivity, possible hallucinations,
7 irritability, increase in blood pressure and heart
8 rate, headaches, tachycardia.

9 Q. What level of Methamphetamines did Mr.
10 Norman have in his blood?

11 A. .56 micrograms per mil.

12 Q. And is a concentration of .56 per
13 milliliter a high, moderate or low level of
14 Methamphetamines in his system?

15 A. Well, the best way to put it is, it's
16 potentially lethal. It's in the range that has been
17 associated with fatality.

18 Q. Would that level of the Methamphetamines
19 in Mr. Norman's system, the .56 micrograms per
20 milliliter, be considered lethal or toxic to you as
21 a forensic toxicologist?

22 A. Yes, sir.

23 Q. And what does that mean, that it's
24 lethal or a toxic level?

25 A. That based on the concentrations, the

1 questions.

2 A. Pretty much.

3 MR. CARNIE: That's all I have.

4 MR. HENSON: Doctor, do you want to read
5 this deposition or do you want to waive it? What do
6 you want to do?

7 THE WITNESS: I would just like a copy
8 of it.

9 MR. HENSON: Okay. We can certainly get
10 you a copy of it. Actually, just send it to me and
11 I'll get it to him.

12 - - - - -

13 (Deposition concluded at 3:11 p.m.)

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